

Sills Cummis & Gross

A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Tel: (973) 643-7000
Fax (973) 643-6500

101 Park Avenue
28th Floor
New York, NY 10178
Tel: (212) 643-7000
Fax: (212) 643-6500

Jeffrey J. Greenbaum
Member
Admitted In NJ, NY
Direct Dial: 973-643-5430
Email: jgreenbaum@sillscummis.com

600 College Road East
Princeton, NJ 08540
Tel: (609) 227-4600
Fax: (609) 227-4646

March 27, 2018

Via ECF

The Honorable Steven C. Mannion, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *White, et al. v. LG Electronics, Inc., et al.*
Civil Action No. 17-1775 (MCA)(SCM)

Dear Magistrate Judge Mannion:

We, along with Latham & Watkins LLP, represent Defendant LG Electronics U.S.A., Inc. ("LG"), and write on behalf of LG, Sony Electronics Inc., and Samsung Electronics America, Inc. (collectively, "Defendants"), to respond briefly to the March 22, 2018 letter of Plaintiffs' counsel [D.E. 61-1]. The statements in that letter are not true, as the email correspondence among counsel can confirm. In the absence of any effort from Plaintiffs' counsel to meet and confer, Defendants affirmatively, timely, and repeatedly sought to do so. We look forward to meeting with the Court at the Rule 16 conference on March 28, 2018.

Respectfully submitted,

/s/ Jeffrey J. Greenbaum

JEFFREY J. GREENBAUM

cc: Hon. Madeline Cox Arleo, U.S.D.J. (via ECF)
All counsel of record (via ECF)